

Exhibit 7

Elizabeth Bernard

From: Elizabeth Bernard
Sent: Friday, June 23, 2023 1:13 PM
To: Moore, Ian; anish.desai@weil.com
Cc: edibenedetto@shawkeller.com; Tesla_AD_Attorneys; Tesla_AD; began@mnat.com; Clark, Cameron; Autonomous_Tesla
Subject: Autonomous Devices v. Tesla

Hi Anish and Ian,

Thank you for the meet and confer last Friday, June 16. The parties discussed the issues raised in AD's June 8 letter and Tesla's June 15 response. As discussed and agreed during the meet and confer:

- AD's Interrogatory No. 1: Tesla will supplement its response by July 14.
- AD's Interrogatory No. 2: Tesla will supplement its response consistent with Rule 33(d) the week following its June 30 production.
- AD's Interrogatory No. 3: Tesla will supplement its response by July 14.
- AD's Interrogatory Nos. 4 and 7: Tesla agreed to supplement its responses to these Interrogatories within a month of AD's ¶ 6c disclosures. Tesla will inform AD if it needs to request additional time.
- AD's Interrogatory No. 6: Tesla indicated that it has not located any responsive "product requirement documents, market studies, consumer surveys, or other reports that identify customer or industry preferences" related to autonomous driving. Tesla confirmed its search included documents related to the Full Self Driving and Enhanced Autopilot features. Tesla agreed to continue its investigation and supplement its response by July 14th to confirm that there are no responsive documents or identify any documents located in its ongoing investigation.
- AD's Interrogatory No. 8: AD confirmed that it seeks production and identification of all patent license agreements, settlement agreements, and/or covenants not to sue related to products identified by Tesla in Interrogatory No. 1, including Tesla Models S, 3, X, and Y and the hardware and firmware identified, as these agreements are indisputably discoverable and relevant. Regarding comparability, AD confirmed that it seeks the identification of all patent license agreements, settlement agreements, and/or covenants not to sue that Tesla may rely on in this case, but does not seek any expert analysis on comparability. Tesla agreed to further discuss this Interrogatory with the client and to supplement its response by July 21.
- AD's Interrogatory No. 10: AD confirmed this Interrogatory seeks the standard identification of employees knowledgeable regarding the accused technology, and AD's discovery is not limited to Tesla's current employees. It is AD's understanding that employees involved in the initial development of the accused technology have left Tesla and may have highly relevant information regarding, *inter alia*, the operation, testing, research, development, studies, benefits, and value of the accused technology. As such, AD is entitled to discovery regarding former employees who may be relevant custodians or deponents in this case.

AD, however, agreed to reconsider the scope of this Interrogatory. AD will narrow the scope to the identification of former managers and supervisors involved in the Fleet learning aspects of Tesla's Full Self Driving and Enhanced Autopilot technology, including their name, last known contact information, former title at Tesla, and dates of employment. Tesla does not need to disclose the reasons why the former

employees left Tesla. Please confirm whether Tesla will agree to this scope and supplementing its response by July 14.

- AD's Requests for Production: Tesla confirmed that it will be making a production on June 30. Tesla agreed to amend its responses to AD's Requests for Production to: 1) indicate where no responsive documents exist after a reasonable search; and 2) to identify with further specificity what Tesla objects to, what it is producing, and what it is withholding, consistent with Rule 34, by July 7.
- Tesla's Requests for Production: AD agreed to likewise amend its responses to Tesla's Requests for Production by July 7.

We look forward to Tesla's June 30 production and supplemental responses in July. Thank you.

Best regards,

Elizabeth

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